

IN RE:	:	CHAPTER 13
WILLIAM BENNETT GOURLEY	:	
aka William Gourley	:	
KATHLEEN DENISE GOURLEY,	:	CASE NO. 1:20-bk-02668
Debtors	:	
	:	
WILLIAM BENNETT GOURLEY	:	
aka William Gourley	:	
KATHLEEN DENISE GOURLEY,	:	
Movants	:	OBJECTION TO CLAIM # 12
v.	:	
QUANTUM3 GROUP LLC as agent for		
JH CX Liquidating Trust LLC ,		
Respondent/Claimant		

5. Rule 3001(c)(2)(A) requires an itemized statement showing all applicable interest, fees, expenses, and/or charges be filed with the proof of claim.

6. Without the required documentation attached to the claim, Debtor's counsel cannot ascertain whether the Claimant is entitled to collect the claim; whether the claim amount is correct; and which state's statute of limitations applies.

7. If the applicable statute of limitations is Pennsylvania, then the Claimant's claim is beyond the statute of limitations for collection.

8. The Debtor believes that the claim is beyond the statute of limitations for collection and may be overstated, but without further documentation cannot determine the validity of the claim. The attachment to the proof of claim indicates that the last transaction on the account was made on August 18, 2016 and the obligation was charged off on August 18, 2016.

9. The claim should be disallowed because the claim is beyond the statute of limitation for collections.

WHEREFORE, the Debtors hereby request that this Honorable Court enter an order

1. Disallowing and dismissing the claim; and
2. Precluding the Claimant from presenting the omitted information as evidence in any contested matter or adversary proceeding pursuant to Rule 3001(c)(2)(D)(i); and
3. Granting such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

Dorothy L. Mott, Esquire
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**LOCAL BANKRUPTCY FORM 3007-1
IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

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	:	OBJECTION TO CLAIM # 12
WILLIAM BENNETT GOURLEY	:	
aka William Gourley	:	
KATHLEEN DENISE GOURLEY,	:	
Objectors	:	
	:	
QUANTUM3 GROUP LLC as agent for	:	
JH CX Liquidating Trust LLC ,	:	
Respondent/Claimant	:	

TO:QUANTUM3 GROUP LLC ("Claimant")

**NOTICE OF OBJECTION TO CLAIM AND DEADLINE TO REQUEST HEARING
DATE**

William Bennett Gourley has filed an objection to the proof of claim you filed in this bankruptcy case.

NOTICE: Your claim may be reduced, modified, or eliminated. You should read this notice and the objection carefully and discuss them with your attorney, if you have one.

If you do not want the court to enter an order affecting your claim, then on or before December 13, 2020, (30 days from the date of service), you or your lawyer must file a request for hearing or a written response to the objection explaining your position.

Those not permitted to file electronically must deliver any request for hearing or response by U.S. mail, courier, overnight/express mail, or in person at: (select the appropriate address)

Ronald Reagan Federal Building
228 Walnut Street Rm 320
Harrisburg, PA 17101

If you mail your request for hearing or response to the court, you must mail it early enough so the court will receive on or before the date stated above.

You must also send a copy of your request for hearing or response to:
Dorothy L. Mott, Esquire
Mott & Gendron Law
125 State Street
Harrisburg, PA 17101
717. 232.6650 Tel
717.232.0476 Fax
doriemott@aol.com

If you or your attorney do not take these steps, the court may decide that you do not oppose an order affecting your claim. Attorney for Objector

/s/ Dorothy L. Mott
Dorothy L. Mott Law Office, LLC
PA ID: 43568
125 State Street, Harrisburg PA 17101
717. 232.6650 Tel
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Date of Notice: November 13, 2020

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

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Movants	:	OBJECTION TO CLAIM # 12
v.	:	
QUANTUM3 GROUP LLC as agent for	:	
JH CX Liquidating Trust LLC ,	:	
Respondent/Claimant	:	

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on November 13, 2020, I served a copy of the foregoing document(s) electronically or by placing the same in the United States Mail, First Class, postage pre-paid, addressed as follows on the following parties:

Name and Address	Mode of Service
CHARLES J DEHART, III ESQUIRE 8125 ADAMS DRIVE SUITE A HUMMELSTOWN PA 17036 dehartstaff@pamd13trustee.com	Electronically
QUANTUM3 GROUP LLC as agent for JH CX Liquidating Trust LLC PO BOX 788 KIRKLAND, WA 98083-0788	First Class Mail, Postage Prepaid

I certify under penalty of perjury that the foregoing is true and correct.

Date: 11/13/2020

/s/Dorothy L Mott

Dorothy L Mott, Esquire
Atty ID #43568
Dorothy L. Mott Law Office, LLC
125 State Street
Harrisburg, PA 17101
(717) 232-6650 TEL
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